

EXHIBIT C

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i> KrisJenn Ranch, LLC, <i>Debtor</i>	§ § § § §	Chapter 11 Case No. 20-50805
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KrisJenn Ranch, LLC, et al., <i>Plaintiffs,</i> v. DMA Properties, Inc.; and Longbranch Energy, LP, et al., <i>Defendants.</i>	§ § § § § § § § § § §	 Adversary No. 20-05027
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DMA Properties, Inc. and Longbranch Energy, LP, et al. <i>Counterplaintiffs,</i> v. KrisJenn Ranch, LLC; Larry Wright, et al., <i>Counterdefendants.</i>	§ § § § § § § § § § §	 Adversary No. 20-05027
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**DMA PROPERTIES, INC. AND LONGBRANCH ENERGY, LP’S
JOINT POSTJUDGMENT DISCOVERY REQUESTS
TO KRISJENN RANCH, LLC, LARRY WRIGHT, ET AL.**

DMA Properties, Inc. (“DMA”), Frank Daniel Moore, and Longbranch Energy, LP (“Longbranch”) serve these postjudgment discovery requests on KrisJenn Ranch, LLC; KrisJenn Ranch, LLC, Series Uvalde Ranch; KrisJenn Ranch, LLC, Series Pipeline Row; and Larry Wright.

Respectfully,

CLEVELAND | KRIST PLLC

/s/ Austin H. Krist

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*Attorneys for DMA, Moore, and
Longbranch*

CERTIFICATE OF SERVICE

I hereby certify that this document was served on KrisJenn Ranch, LLC; KrisJenn Ranch, LLC, Series Uvalde Ranch; KrisJenn Ranch, LLC, Series Pipeline Row; and Larry Wright through their counsel of record by way of e-mail and/or e-service on October 23, 2024.

/s/ Lourdes Ortiz

Lourdes Ortiz

INSTRUCTIONS

1. You shall serve a copy of the documents, responses, and objections to these requests, if any, within thirty (30) days after the service of these requests.
2. All grounds for an objection to a request shall be stated with specificity.
3. In the event any request cannot be fully responded to after the exercise of reasonable diligence, you shall respond as completely as you can and set forth the reasons why you cannot respond, and state what is needed to be done in order to be in a position to respond fully and estimate when you will be in the position to do so.
4. Each request shall be set forth immediately prior to the response thereto.
5. A document is deemed to be in your custody or control if you have possession of or have the right to secure such document from another person having possession thereof.
6. If any document requested herein was once under your possession, custody, or control, but has been lost, discarded, destroyed, transferred, or removed from your possession, custody or control, with respect to each such document, please state: a) the identity and the description of each such document by its date, title, and nature; b) when each such document was most recently in your possession, custody, or control, and the circumstances by which you no longer have possession, custody, or control of such document, including an identification of the person or persons, if any, presently in possession, custody or control of such document; c) the identity of the person or persons who discarded, destroyed, transferred, or removed such document, the person or persons who know about the discarding, destruction, transfer or removal of such document, as well as the reasons why such document was discarded, destroyed, transferred or removed; and d) the identity of all persons having knowledge of the contents of such document.
7. You shall produce the requested documents either as they are kept in the ordinary course of business, or as they are organized and labeled in a manner such that they are grouped separately for each of the following requests. To the extent such produced documents include electronically stored information, such information shall be produced in the form in which it is ordinarily maintained or in a reasonably usable form, including metadata.
8. Each of these requests shall be construed independently and shall not be limited by any other request.
9. If, in answering these requests and interrogatories, you claim that any request, or a definition or instruction applicable thereto, is ambiguous or objectionable, do not use such claim as a basis for refusing to respond, but rather set forth as part of the response the language you claim is ambiguous or objectionable and the interpretation you have used to respond to the individual request.
10. Each gender of any word includes the other genders.
11. The use of the singular form of any word includes the plural, and vice versa, as

necessary to bring within the scope of the following requests all information which might otherwise be construed to be outside its scope.

12. The use of any form of any verb shall be considered to include within its meaning all of the forms of the verb so used.

DEFINITIONS

1. “Communication” means the transmittal of information, in the form of facts, ideas, and inquiries or otherwise, by any means whatsoever.

2. “Document” means any written, electronic, magnetic or graphic matter however produced or reproduced (including electronically stored information). It includes writings, emails, drawings, graphs, charts, photographs, sound recordings, images and other data compilations from which information can be obtained either directly or, if necessary, after translation by the responding party through detection devices into reasonably useable form. A draft of a non-identical copy is a separate document within the meaning of this term.

3. “Identify” and, where appropriate, “identifying” shall mean:

- a. With respect to a person to state the full name, current home address and phone number, and current employer and job title, and if this current information is not known, so state and provide the last-known information as well as any other information that may be helpful in locating the person.
- b. With respect to a document or communication to state its title, creation and transmittal dates, author, recipients, custodians, bates numbers, and a general description of its contents, relevance, and conclusions.
- c. When used in reference to an occurrence or event, disclosing the date, nature, and location of the occurrence or event and identifying all persons or entities involved.
- d. When used with respect to a written statement, to quote the statement, its date and by whom it was made and identify, by document and page number, the source of the statement.
- e. When used with respect to an oral statement to (i) quote the statement or, if unable to do so, to state the contents of the statement as specifically as possible; (ii) identify the speaker; (iii) identify the person to whom the statement was made; (iv) identify all other persons present when the statement was made; (v) provide the date of the statement; (vi) state where the statement was made; and (vii) describe the circumstances of any meeting or conversation in which the statement was made.
- f. When used with respect to a meeting or conversation to (i) identify the persons present either in person or by teleconference; (ii) provide the date;

(iii) identify the location of the meeting or the location of participants by teleconference; and (iv) describe the subjects discussed in the meeting or call.

g. When used with respect to a date, to state the day, month, and year.

4. “KrisJenn Ranch” shall mean Counterdefendant KrisJenn Ranch, LLC, as well as any predecessors any predecessors, successors, subsidiaries, affiliates, parent corporations or other related entities, and any agents, servants, representatives, attorneys, consultants, sureties, indemnitors, insurers or employees, past and present, to the extent such persons acted or purported to act on its behalf or possess information or documents with respect to any matter inquired about herein.

5. “KrisJenn–Uvalde” shall mean Counterdefendant KrisJenn Ranch, LLC, Series Uvalde Ranch, as well as any predecessors any predecessors, successors, subsidiaries, affiliates, parent corporations or other related entities, and any agents, servants, representatives, attorneys, consultants, sureties, indemnitors, insurers or employees, past and present, to the extent such persons acted or purported to act on its behalf or possess information or documents with respect to any matter inquired about herein.

6. “KrisJenn–Pipeline Row” shall mean Counterdefendant KrisJenn Ranch, LLC, Series Pipeline Row, as well as any predecessors any predecessors, successors, subsidiaries, affiliates, parent corporations or other related entities, and any agents, servants, representatives, attorneys, consultants, sureties, indemnitors, insurers or employees, past and present, to the extent such persons acted or purported to act on its behalf or possess information or documents with respect to any matter inquired about herein.

7. The terms “relate to,” “relating to,” “refer to,” “referring to,” “concern,” “concerning,” and their derivations shall be interpreted so as to encompass the scope of discovery set forth in Federal Rule of Civil Procedure 26(b)(1), and shall mean, for example: deal with, regard, constitute, pertain to, reflect, consider, underlie, modify, amend, confirm, mention, endorse, evidence, summarize, memorialize, describe, analyze, evaluate, represent, qualify, terminate, revoke, cancel, negate, comprise, contain, embody, enumerate, involve, identify, state, and correspond to.

8. “Person” means the singular as well as the plural, and masculine as well as the feminine, and includes any natural person or business, legal or governmental entity or association.

9. “Wright” shall mean Third-Party Defendant Larry Wright, as well as any predecessors any predecessors, successors, subsidiaries, affiliates, parent corporations or other related entities, and any agents, servants, representatives, attorneys, consultants, sureties, indemnitors, insurers or employees, past and present, to the extent such persons acted or purported to act on his behalf or possess information or documents with respect to any matter inquired about herein.

10. “You” and “Defendants” shall mean any of Counterdefendants KrisJenn Ranch, KrisJenn–Uvalde, KrisJenn–Pipeline Row, and/or Defendant Wright, as well as any predecessors any predecessors, successors, subsidiaries, affiliates, parent corporations or other related entities,

and any agents, servants, representatives, attorneys, consultants, sureties, indemnitors, insurers or employees, past and present, to the extent such persons acted or purported to act on your behalf or possess information or documents with respect to any matter inquired about herein.

11. The terms “and,” “or,” and “and/or” shall be construed in the conjunctive or the disjunctive, whichever makes the request more inclusive. The disjunctive includes the conjunctive, and vice versa.

12. The terms “any” and “each” shall be construed as “all,” “each and every,” or “any one,” whichever makes the request more inclusive.

13. The term “all” shall include and encompass “any” or “each,” whichever makes the request more inclusive.

14. The use of the word “the” shall not be construed as limiting the scope of any request.

15. The terms “including” and “include” mean “specifically including but not limited to.”

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies all real estate presently owned by you, any affiliated entity, any subsidiary or parent company, or any Related Trust, or in which you or any Related Trust own or claim an interest, or which has been sold, leased, or otherwise disposed of by you (voluntarily or involuntarily) at any time during the past ten (10) years.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2:

Any and all documentation of any nature whatsoever (including, but not limited to, all statements and canceled checks and other items) in your possession, or subject to your possession, custody, or control, that identifies all checking accounts, money market accounts, savings accounts, certificates of deposit, mutual funds, investment accounts, trust accounts, or other accounts or funds of any nature whatsoever in which you or any Related Trust have or have had a deposit, right of withdrawal, or any other interest in since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3:

Your last five (5) most recent tax returns (including all supporting schedules), and the last five (5) most recent tax returns for all businesses, partnerships, corporations, trusts, or estates (including all supporting schedules) that you have had any ownership or other interest in since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4:

Your last five (5) most recent tax returns (including all supporting schedules), and the last five (5) most recent tax returns for all businesses, partnerships, corporations, trusts, or estates (including all supporting schedules) that you have had any right to control or over which you have exercised any control since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies all stocks, bonds, securities, mortgages, certificates of deposit, profit sharing plans, trusts (as trustee or beneficiary), general or limited partnership interests, or similar ownership interests or investments in which you or any Related Trust own or

claim an interest.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies all crops, livestock (including horses), or wild game in which you or any Related Trust own or claim (or have owned or claimed) an ownership interest, or that you or any Related Trust have sold, leased, given away, or otherwise disposed of since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies items of property and the value of each item that you or any Related Trust received in a property settlement.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any rental agreements between you or any Related Trust and any landlords, boarders, tenants, or sub-tenants.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that is evidence of income received since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that states the full name, complete address, and telephone number of each person, financial institution, or other entity with which you or any Related Trust deposit any funds.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any payments exceeding \$1,000.00 from you or any Related Trust to any person or entity during the last twelve (12) months.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any gifts of money or property worth more than \$500.00 received by you or any Related Trust within the last twelve (12) months.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any depository, safe, vault, or safe-deposit box to which you or any Related Trust has access.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any and all insurance policies in force and owned or paid for by you or any Related Trust, or pursuant to which you or any Related Trust are the beneficiary. This documentation should (1) identify the name and address of all insurers (insurance companies) and their agents, (2) consist of a copy or other duplication of the policy, and (3) include the current cash value if any of all policies.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15:

A complete and detailed listing of, and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any interest you or any Related Trust have in any vehicles, furniture, firearms, jewelry, art object(s), coin, stamp, baseball card collections or other collector's items, furs, stocks, bonds, T-Bills, memberships, tickets, oil and gas interests, mineral interests, and animals of the value of \$500.00 or more.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any title to any of your personal property now pledged as security for a debt.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17:

Copies of any and all assumed name certificates or partnership certificates that you have used, filed, or caused to be filed since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any ownership interest in any business, partnership, joint venture, or other unincorporated legal entity since 2017 for you or any Related Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies you or any Related Trust as an officer, director, partner, or stockholder or owner of any other kind of interest (including, but not limited to, debentures, purchase options, and beneficial interests) of a corporation or other entity.

RESPONSE:

REQUEST FOR PRODUCTION NO. 20:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies you or any Related Trust as a beneficiary of any trust or estate (either by devise or under the laws of decent and distribution).

RESPONSE:

REQUEST FOR PRODUCTION NO. 21:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies you or any Related Trust as the settlor, creator, or contributor to any trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 22:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies you as the trustee, successor trustee, or substitute trustee to any trust including any Related Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 23:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any and all of your accounts receivable, including but not limited to payments from governmental entities, insurance plans or policies, and health care organizations, for the past twelve (12) months.

RESPONSE:

REQUEST FOR PRODUCTION NO. 24:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any and all of the accounts receivable, including but not limited to payments from governmental entities, insurance plans or policies, and health care organizations, owed for the past twelve (12) months to (i) you or any Related Trust any or (ii) any entity including but not limited to any professional association in/of which you or any Related Trust are an owner, member, shareholder, director, or officer.

RESPONSE:

REQUEST FOR PRODUCTION NO. 25:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any money owed to you or any Related Trust by any person or entity (including, but not limited to, promissory notes and accounts receivable).

RESPONSE:

REQUEST FOR PRODUCTION NO. 26:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any money owed by you or any Related Trust to any person or entity (including, but not limited to, promissory notes and accounts receivable).

RESPONSE:

REQUEST FOR PRODUCTION NO. 27:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any conveyance, transfer, gift, or other disposition of property by you or any Related Trust, with the reservation of rights, benefits, or options for the acquisition of the property at some future date.

RESPONSE:

REQUEST FOR PRODUCTION NO. 28:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any real estate disposed of by sale, gift, or other action by you or any Related Trust since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 29:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any mineral interest or oil and gas interest disposed of by sale, gift, or other action by you or any Related Trust since 2017, including but not limited to any lease, royalty, working interest, well bore interest, overriding royalty interest, or equity position.

RESPONSE:

REQUEST FOR PRODUCTION NO. 30:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any agreement by which some entity or other person was granted an option to buy any assets of yours or of any Related Trust since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 31:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any lawsuits or litigation in which you or any Related Trust has been a plaintiff, defendant or other capacity.

RESPONSE:

REQUEST FOR PRODUCTION NO. 32:

Any and all documentation of any nature whatsoever in your possession, or subject to your

possession, custody, or control, that identifies any judgment against you or any Related Trust that is unpaid.

RESPONSE:

REQUEST FOR PRODUCTION NO. 33:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any judgment in your favor or that has been assigned to you or any Related Trust that remains unpaid.

RESPONSE:

REQUEST FOR PRODUCTION NO. 34:

Any and all documentation of any nature whatsoever in your possession, or subject to your possession, custody, or control, that identifies any bankruptcy proceedings filed by you.

RESPONSE:

REQUEST FOR PRODUCTION NO. 35:

Any and all credit cards and any and all documentation of any nature whatsoever in your possession or subject to your possession, custody, or control, that identifies any credit card accounts or charge accounts.

RESPONSE:

REQUEST FOR PRODUCTION NO. 36:

All titles or other documents reflecting ownership by you or any Related Trust, and business you or any Related Trust share ownership or hold stock in: motor vehicles, motorcycles, travel trailers, motor homes, boats, airplanes, dogs, horses, cattle, or other livestock, tractors, trailers, computers, copy machines, typewriters, adding machines, or other office equipment.

RESPONSE:

REQUEST FOR PRODUCTION NO. 37:

A detailed list of any and all cash you or any Related Trust (as applicable) holds, or which is held by another on behalf of you or any Related Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 38:

Copies of all certificates of stock you or any Related Trust (as applicable) holds, or which are

held by another on behalf of you or any Related Trust (whether marketable or non-marketable security).

RESPONSE:

REQUEST FOR PRODUCTION NO. 39:

Copies of all certificates of any restricted stock or security you or any Related Trust (as applicable) currently owns or holds or which are held by another on your behalf or on behalf of any Related Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 40:

A detailed listing of and copies of all loans payable to you or any Related Trust, and accounts receivable of you or any Related Trust, and loans payable or accounts payable by you or any Related Trust that are outstanding and unsatisfied as of December 1, 2022.

RESPONSE:

REQUEST FOR PRODUCTION NO. 41:

The legal description and appraised value of any real estate currently owned by you or any Related Trust (as applicable).

RESPONSE:

REQUEST FOR PRODUCTION NO. 42:

A list of all persons and entities that have provided you or any Related Trust with advice or assistance in the management of your financial affairs of you since 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 43:

Provide all documents you have filed with the Texas Secretary of State since 2017.

RESPONSE:

INTERROGATORIES

INTERROGATORY NO. 1:

Please state for each person answering these interrogatories your full legal name, including your middle name, and each other name you have used at any time, including each nickname, alias, and (if appropriate) married name from before your marriage.

RESPONSE:

INTERROGATORY NO. 2:

Have you filed an assumed name certificate or partnership certificate in the last 10 years? If so, for each certificate please state:

- a. The full assumed or partnership name used.
- b. The full name of the person using it.
- c. The city, county, and state in which the assumed or partnership name was primarily used.

RESPONSE:

INTERROGATORY NO. 3:

Please list all assets belonging to KrisJenn Ranch.

RESPONSE:

INTERROGATORY NO. 4:

Please list all assets belonging to KrisJenn–Uvalde.

RESPONSE:

INTERROGATORY NO. 5:

Please list all assets belonging to KrisJenn–Pipeline Row.

RESPONSE:

INTERROGATORY NO. 6:

Please list all assets belonging to Wright.

RESPONSE:

INTERROGATORY NO. 7:

Please state KrisJenn Ranch's Tax Identification Number(s), if any.

RESPONSE:

INTERROGATORY NO. 8:

Please state KrisJenn– Uvalde's Identification Number(s), if any.

RESPONSE:

INTERROGATORY NO. 9:

Please state KrisJenn– Pipeline Row's Identification Number(s), if any.

RESPONSE:

INTERROGATORY NO. 10:

Please state Wright's Tax Identification Number(s), if any.

RESPONSE:

INTERROGATORY NO. 11:

Please state each of your current business addresses and/or operating addresses (street address, city, county, state) and telephone numbers (including area code). Also please state each post office box address used.

RESPONSE:

INTERROGATORY NO. 12:

Does KrisJenn Ranch receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

RESPONSE:

INTERROGATORY NO. 13:

Does KrisJenn–Uvalde receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

RESPONSE:

INTERROGATORY NO. 14:

Does KrisJenn–Pipeline Row receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

RESPONSE:

INTERROGATORY NO. 15:

Does Wright receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

RESPONSE:

INTERROGATORY NO. 16:

For each of your expenses that recurs on a monthly or other regular basis and exceeds \$500, please state:

- a. The frequency with which payments are made.
- b. The amount of each payment and either (1) that this amount is the same for each payment or (2) that this amount is an average for the past year.
- c. The full name and complete address of the recipient of the payments.
- d. The full name and complete address of each person or entity from whom you acquire the assets to make payments.

RESPONSE:

INTERROGATORY NO. 17:

Does KrisJenn Ranch have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.
- c. A description of every improvement on the property.
- d. The name of the person or entity having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity KrisJenn Ranch has in the property.
- g. Whether the property is encumbered. If it is, also please state:
 - (1) The nature of the encumbrance.
 - (2) The full name and complete address of the holder of the encumbrance.
 - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.
- k. Whether any money or property has been placed in escrow. If it has, also please state:
 - (1) The full name and complete address of the person or entity now having possession of the escrow amount or property.
 - (2) The amount of money or value of the property in escrow.

RESPONSE:

INTERROGATORY NO. 18:

Does KrisJenn-Uvalde have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.
- c. A description of every improvement on the property.
- d. The name of the person or entity having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity KrisJenn-Uvalde has in the property.
- g. Whether the property is encumbered. If it is, also please state:
 - (1) The nature of the encumbrance.
 - (2) The full name and complete address of the holder of the encumbrance.
 - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.
- k. Whether any money or property has been placed in escrow. If it has, also please state:
 - (1) The full name and complete address of the person or entity now having

- possession of the escrow amount or property.
- (2) The amount of money or value of the property in escrow.

RESPONSE:

INTERROGATORY NO. 19:

Does KrisJenn–Pipeline Row have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.
- c. A description of every improvement on the property.
- d. The name of the person or entity having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity KrisJenn–Pipeline Row has in the property.
- g. Whether the property is encumbered. If it is, also please state:
 - (1) The nature of the encumbrance.
 - (2) The full name and complete address of the holder of the encumbrance.
 - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.
- k. Whether any money or property has been placed in escrow. If it has, also please state:
 - (1) The full name and complete address of the person or entity now having possession of the escrow amount or property.
 - (2) The amount of money or value of the property in escrow.

RESPONSE:

INTERROGATORY NO. 20:

Does Wright have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.
- c. A description of every improvement on the property.
- d. The name of the person (Wright, his spouse, or both) having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity Wright has in the property.
- g. Whether the property is encumbered. If it is, also please state:
 - (1) The nature of the encumbrance.

- (2) The full name and complete address of the holder of the encumbrance.
 - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.
- k. Whether any money or property has been placed in escrow. If it has, also please state:
 - (1) The full name and complete address of the person or entity now having possession of the escrow amount or property.
 - (2) The amount of money or value of the property in escrow.

RESPONSE:

INTERROGATORY NO. 21:

Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which KrisJenn Ranch either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to KrisJenn Ranch of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

RESPONSE:

INTERROGATORY NO. 22:

Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which KrisJenn–Uvalde either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to KrisJenn–Uvalde of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

RESPONSE:

INTERROGATORY NO. 23:

Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which KrisJenn–Pipeline

Row either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to KrisJenn–Pipeline Row of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

RESPONSE:

INTERROGATORY NO. 24:

Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which Wright either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to Wright of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

RESPONSE:

INTERROGATORY NO. 25:

Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of KrisJenn Ranch? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in KrisJenn Ranch's name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for KrisJenn Ranch's benefit, KrisJenn Ranch's relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit it is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest KrisJenn Ranch has in the property.

RESPONSE:

INTERROGATORY NO. 26:

Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of KrisJenn-Uvalde? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in KrisJenn-Uvalde's name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for KrisJenn-Uvalde's benefit, KrisJenn-Uvalde's relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit it is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest KrisJenn-Uvalde has in the property.

RESPONSE:

INTERROGATORY NO. 27:

Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of KrisJenn-Pipeline Row? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in KrisJenn-Pipeline Row's name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for KrisJenn-Pipeline Row's benefit, KrisJenn-Pipeline Row's relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit it is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest KrisJenn-Pipeline Row has in the property.

RESPONSE:

INTERROGATORY NO. 28:

Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of Wright? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in Wright's name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for Wright's benefit, Wright's relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit it is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest Wright has in the property.

RESPONSE:

INTERROGATORY NO. 29:

Has KrisJenn Ranch furnished a financial statement to any person or entity in the last five years? If KrisJenn Ranch has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if KrisJenn Ranch will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

RESPONSE:

INTERROGATORY NO. 30:

Has KrisJenn-Uvalde furnished a financial statement to any person or entity in the last five years? If KrisJenn-Uvalde has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if KrisJenn-Uvalde will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

RESPONSE:

INTERROGATORY NO. 31:

Has KrisJenn–Pipeline Row furnished a financial statement to any person or entity in the last five years? If KrisJenn–Pipeline Row has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if KrisJenn–Pipeline Row will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

RESPONSE:

INTERROGATORY NO. 32:

Has Wright furnished a financial statement to any person or entity in the last five years? If Wright has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if you will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

RESPONSE:

INTERROGATORY NO. 33:

Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for KrisJenn Ranch. Please state:

- a. The source and amount of each item of income listed.
- b. The total income received for each year, whether or not reported.
- c. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
- d. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.
- e. The full name and complete address of each person who worked on or helped prepare each return.

RESPONSE:

INTERROGATORY NO. 34:

Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for KrisJenn–Uvalde. Please state:

- e. The source and amount of each item of income listed.
- f. The total income received for each year, whether or not reported.
- g. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
- h. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.
- f. The full name and complete address of each person who worked on or helped prepare each return.

RESPONSE:

INTERROGATORY NO. 35:

Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for KrisJenn–Pipeline Row. Please state:

- a. The source and amount of each item of income listed.
- b. The total income received for each year, whether or not reported.
- c. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
- d. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.
- g. The full name and complete address of each person who worked on or helped prepare each return.

RESPONSE:

INTERROGATORY NO. 36:

Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for Wright. Please state:

- a. The source and amount of each item of income listed.
- b. The total income received for each year, whether or not reported.
- c. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
- d. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.

- h. The full name and complete address of each person who worked on or helped prepare each return.

RESPONSE:

INTERROGATORY NO. 37:

Does KrisJenn Ranch now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 38:

Does KrisJenn-Uvalde now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 39:

Does KrisJenn-Pipeline Row now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 40:

Does Wright now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 41:

Does KrisJenn Ranch claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.
2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.

9. Leases, life estates, remainder interests, or other interests in real property.
10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 42:

Does KrisJenn-Uvalde claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.
2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
9. Leases, life estates, remainder interests, or other interests in real property.
10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 43:

Does KrisJenn–Pipeline Row claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.
2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
9. Leases, life estates, remainder interests, or other interests in real property.
10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 44:

Does Wright claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.
2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.

8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
9. Leases, life estates, remainder interests, or other interests in real property.
10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 45:

Does KrisJenn Ranch now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.
- c. The full name and complete address of the person or entity having possession or control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 46:

Does KrisJenn-Uvalde now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.
- c. The full name and complete address of the person or entity having possession or

- control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 47:

Does KrisJenn–Pipeline Row now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.
- c. The full name and complete address of the person or entity having possession or control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 48:

Does Wright now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.
- c. The full name and complete address of the person or entity having possession or control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 49:

Does KrisJenn Ranch own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.
- f. The name of the person having title to or an interest in the property and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 50:

Does KrisJenn–Uvalde own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.
- f. The name of the person having title to or an interest in the property and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 51:

Does KrisJenn–Pipeline Row own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.
- f. The name of the person having title to or an interest in the property and the nature of

the interest.

RESPONSE:

INTERROGATORY NO. 52:

Does Wright own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.
- f. The name of the person having title to or an interest in the property and the nature of the interest.

RESPONSE:

INTERROGATORY NO. 53:

Does KrisJenn Ranch maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

RESPONSE:

INTERROGATORY NO. 54:

Does KrisJenn-Uvalde maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

RESPONSE:

INTERROGATORY NO. 55:

Does KrisJenn–Pipeline Row maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

RESPONSE:

INTERROGATORY NO. 56:

Does Wright maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

RESPONSE:

INTERROGATORY NO. 57:

Does any person or entity owe KrisJenn Ranch money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

RESPONSE:

INTERROGATORY NO. 58:

Does any person or entity owe KrisJenn–Uvalde money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

RESPONSE:

INTERROGATORY NO. 59:

Does any person or entity owe KrisJenn–Pipeline Row money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

RESPONSE:

INTERROGATORY NO. 60:

Does any person or entity owe Wright money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

RESPONSE:

INTERROGATORY NO. 61:

Has any account receivable of KrisJenn Ranch been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.
- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.
- h. The name of the person who owned the account.

RESPONSE:

INTERROGATORY NO. 62:

Has any account receivable of KrisJenn–Uvalde been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.
- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.

- h. The name of the person who owned the account.

RESPONSE:

INTERROGATORY NO. 63:

Has any account receivable of KrisJenn–Pipeline Row been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.
- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.
- h. The name of the person who owned the account.

RESPONSE:

INTERROGATORY NO. 64:

Has any account receivable of Wright been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.
- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.
- h. The name of the person who owned the account.

RESPONSE:

INTERROGATORY NO. 65:

Has KrisJenn Ranch ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. Its party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.

- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against KrisJenn Ranch, date it was entered, and the name of the person against whom it was entered.
- i. KrisJenn Ranch's current attorney of record in such suit, if any.

RESPONSE:

INTERROGATORY NO. 66:

Has KrisJenn-Uvalde ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. Its party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.
- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against KrisJenn-Uvalde, date it was entered, and the name of the person against whom it was entered.
- i. KrisJenn-Uvalde's current attorney of record in such suit, if any.

RESPONSE:

INTERROGATORY NO. 67:

Has KrisJenn-Pipeline Row ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. Its party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.
- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against KrisJenn-Pipeline Row, date it was entered, and the name of the person against whom it was entered.
- i. KrisJenn-Pipeline Row's current attorney of record in such suit, if any.

RESPONSE:

INTERROGATORY NO. 68:

Has Wright ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. His party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.
- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against Wright, date it was entered, and the name of the person against whom it was entered.
- i. Wright's current attorney of record in such suit, if any.

RESPONSE: